

AMENDED Exhibit 834

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA
ADOLESCENT ADDICTION/PERSONAL
INJURY PRODUCTS LIABILITY
LITIGATION,

Case No.
4:22-MD-03047-YGR
MDL No. 3047

v.

This Document Relates to:
ALL ACTIONS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

Coordination Proceeding
Special Title (Rule 3.550) JCCP No. 5255
Judge Carolyn B. Kuhl
SOCIAL MEDIA CASES Dept. 12

March 20, 2025

(caption continued)

Videotaped deposition of
JOSHUA SIEGEL, held at One Manhattan West,
New York, New York, commencing at
10:00 a.m. EDT, on the above date, before
Marie Foley, a Registered Merit Reporter,
Certified Realtime Reporter and Notary
Public.

- - -

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1
2 that to the side.

3 Have you spoken with anyone
4 about this deposition today that you're
5 here?

6 A. Yes.

7 Q. Okay.

8 Who have you spoken to?

9 A. These two attorneys.

10 Q. Okay.

11 And these two attorneys are
12 Snap's attorneys, correct?

13 A. Correct.

14 Q. Okay.

15 And you are no longer with
16 Snapchat. Do I have that correct?

17 A. Correct.

18 Q. Or Snap the company.

19 Okay. And so, when did you,
20 sort of, begin the process of talking to
21 these attorneys next to you in preparation
22 for this deposition today?

23 A. I don't remember the exact date.
24 I left Snap in September, and I think on
25 my way out, someone told me that something

1
2 like this might happen and --

3 Q. Perfect.

4 A. -- that was the first time I
5 heard about it, and I was introduced to
6 these two after that.

7 Q. Okay, understood.

8 Okay. So, you left Snap in 2024
9 in September, correct?

10 A. Correct.

11 Q. Okay.

12 So aside from the two counsel
13 that are beside you, who else have you
14 spoken to about this deposition today?

15 A. There were other Snap lawyers
16 that were in the room. I don't remember
17 everyone's name.

18 Q. Understood.

19 Okay. We'll get to those
20 meetings in just a second, but is anybody
21 else that you've, sort of, worked with at
22 Snap, former employees, have you talked to
23 anyone about your deposition here today?

24 A. Not that I recall, no.

25 Q. Okay.

1
2 product team. It was the business
3 operations team because it was a start-up
4 that I think we had, like, engineering,
5 design and business, or something like
6 that.

7 Q. Okay, understood.

8 And through any of these roles,
9 and we'll go through them sort of in
10 tandem, but through any of these roles,
11 are you collaborating with Design?

12 A. Yes.

13 Q. Okay.

14 And did you do that in the
15 business product lead position?

16 A. Yes.

17 Q. Okay.

18 And why were you collaborating
19 with Design?

20 And throughout this deposition,
21 I'm probably going to be asking you some
22 very basic questions, but forgive me, but
23 it's for my edification and understanding
24 of, sort of, how the company worked.

25 So why were you, when you were

1
2 working in monetization, et cetera,
3 working with the design team in that
4 process?

5 A. For example, we had to design
6 the form and function of Snap Ads.

7 Q. Okay.

8 And so, any other big things
9 that you did in -- in the business product
10 lead position separate and apart from what
11 you told me about monetizing with ads,
12 building out ad platforms and ad server
13 features?

14 A. That -- that is a good summary
15 of what I did.

16 Q. Okay.

17 Do you code at all?

18 A. Not very well.

19 Q. Okay. But did you have to do
20 any of that in your scope of work at Snap?

21 A. I wrote SQL code.

22 Q. Okay. Tell me what that is.

23 A. It's a structured query language
24 to pull data from a database.

25 Q. All right.

1
2 Okay. So, SQL code means
3 structured query language to pull data
4 from a database, correct?

5 A. Correct.

6 Q. All right. And so you knew how
7 to do that, right?

8 A. Yes.

9 Q. What type of information was in
10 the database?

11 A. As I mentioned earlier, a lot of
12 the job was building out features for our
13 ad server, like ad targeting and what
14 state a user is in. Advertisers usually
15 ask for gender and age targeting, and we
16 often needed to look and see in the
17 database, you know, how many users we had
18 in, let's say, Michigan if someone wanted
19 to run a campaign for Coca-Cola in
20 Michigan, that's just an example. And a
21 lot of that data was in the database, and
22 so I would use SQL to pull that data.

23 Q. Okay, understood.

24 And so you were talking about
25 different demographics that would be

1
2 reflected in the database for ad targeting
3 purposes, if I said that correctly. Is
4 that right?

5 A. That's an example, yeah.

6 Q. Okay.

7 And so you might -- at Snap, it
8 sounds like you have buckets of age
9 demographics that you, sort of, focus in
10 on. Is that fair enough?

11 MR. BLAVIN: Objection; vague
12 and ambiguous.

13 A. Yeah, I'm not sure if I
14 understand the question.

15 Q. Okay.

16 At Snap do you look at users in
17 segments so you can understand that user's
18 behavior or inclinations or motivations,
19 et cetera?

20 A. Yeah, a lot of this was, at the
21 time, driven by what advertisers look for
22 and what's competitive with other
23 platforms.

24 So for example, if you're
25 targeting ads on YouTube or on Facebook at

1
2 the time, they would offer age buckets,
3 they would call it, and so, you know, you
4 can target users over 35, for example.

5 Q. Understood.

6 Okay, that's all in the business
7 product lead sector.

8 At some point, you move over, I
9 don't know how much of a move it was so
10 you'll tell me in a second, but at some
11 point, you move over to Consumer Product
12 Management --

13 A. Correct.

14 Q. -- is that correct?

15 Okay.

16 Was there a mixing of those
17 roles at any point in time, or was that a
18 clean-cut doing something totally
19 different?

20 A. The way I would describe it is
21 at some point in I think it was 2017, we
22 didn't have a consumer product management
23 function, and someone asked me to start
24 helping on a few projects, and as I
25 started helping, I can't remember who, but

1
2 someone suggested that I move over and
3 start a team over there.

4 Q. Okay. And did you hire for that
5 team? Is that how that worked?

6 A. I hired and we pulled some
7 people internally, yeah.

8 Q. Okay.
9 And so you're managing that
10 team, correct?

11 A. Yes. And my recollection is
12 hazy of exactly the sequence of events and
13 who decided what, but yeah, eventually for
14 the next roughly five years, six years, I
15 managed that team.

16 Q. Okay.
17 And then who was your manager,
18 supervisor, to the extent that you had
19 one, in that consumer product manager
20 role?

21 A. For most of the time that I
22 recall, Jacob Andreou was the manager.

23 Q. And then that took you to 2022,
24 correct?

25 A. Correct.

1
2 Q. What were your main roles and
3 responsibilities, at a granular level if
4 you can, give some examples of what you
5 did in that position?

6 A. In the consumer product?

7 Q. That's right.

8 A. So, where to begin.

9 The way the team was structured
10 is we generally had a product manager on
11 each feature, each major feature at first.
12 So, you know, we had one person who was
13 focused on Snapping and Chatting, one
14 person who was focused on Discover, one
15 person who was focused on Snap Map, one
16 person on Camera, and, you know, features
17 like Memories also had a product manager
18 eventually.

19 I think over the course of those
20 years, the team built up to nearly 50
21 product managers, and so at some point, I
22 had a layer of managers underneath me and
23 a lot of the responsibilities, as I would
24 describe it, for this product management
25 team was helping designers, engineers,

1
2 executives make the right decisions on
3 product launches, product changes, product
4 improvements.

5 Q. Okay. I understand that.

6 And so, if I see the -- the --
7 the acronym PM, that stands for product
8 manager, correct?

9 A. Correct.

10 Q. And I see that there is a
11 Consumer PM group.

12 Did you all have, sort of,
13 listservs that went with the particular
14 aspect or department within Snap?

15 A. Yes.

16 Q. Okay. And Consumer PM was one
17 of those groups, correct?

18 A. Yes.

19 Q. And then did you all have shared
20 drives, like a shared Google Drive or
21 something like that where you could put
22 information so that your team can know
23 where to access and find information?

24 A. I wouldn't say that I was that
25 organized. I -- I don't think we -- and,

1
2 I mean, I don't recall having, like, a
3 folder. But if there was a Google
4 document that needed to be shared, you
5 could change the sharing settings from the
6 default of "private" to "shared."

7 Q. Okay.

8 All right. You told me that you
9 could in the Consumer PM role, you could,
10 and did often, collaborate with Design, I
11 believe, to make sure things were set
12 before a launch went out.

13 Is that a fair representation?
14 Did I understand that correctly?

15 MR. BLAVIN: Objection; vague
16 and ambiguous.

17 A. We would collaborate with
18 various teams before a launch went out to
19 make sure that, yeah, it was done
20 properly.

21 Q. Okay.

22 What teams were those?

23 A. We would work with the
24 Engineering Team, the Design Team, the
25 Legal Team including Privacy, the Security

1
2 Engineering Team, in some cases even
3 Compliance. It depends on the feature.
4 In some cases, we would work with our
5 sales team if there was something
6 involving ads. You know, in some cases,
7 we would work with User Operations to get
8 user feedback on something. Later on we
9 had a Safety Advisory Board we would work
10 with.

11 So, it was really all over the
12 company depending on what the feature was.

13 Q. What's an example of some
14 feedback that you would give, for
15 instance, the Design Team from your
16 perspective about what they might need to
17 do or tweak before a product launches?

18 A. An example might be, you know,
19 we often design things using our iOS
20 device and we might need to make sure that
21 something works properly on an Android
22 device.

23 Q. Okay.

24 And was Jacob, what's his last
25 name?

1
2 A. Andreou.

3 Q. Andreou. Was he your manager
4 during that portion of time from 2017 to
5 2022 where you were in Consumer Product
6 Management?

7 A. He was either my manager or
8 manager's manager. I think it varied at
9 times, but, yeah, for the most of it, he
10 was my manager.

11 Q. Okay.
12 Who else was in the mix in
13 managerial --

14 A. Peter Sellis, who was my primary
15 manager.

16 Q. Okay.
17 So he, kind of, followed you
18 along through those years?

19 A. Yeah.

20 Q. And then was there a particular
21 feature or features that you worked on
22 specifically? 'Cause, like I said, it
23 seemed like you were all over the map.
24 But were there specific features that you
25 focused on specifically when you were in

1
2 this consumer product management role, or
3 was it sort of everything?

4 A. Yeah, it was sort of everything
5 that was the Snapchat app. There were
6 some projects that I directly oversaw, but
7 for the most part, my team was responsible
8 for the app.

9 Q. At that particular time, what
10 were the projects that you directly
11 were -- had purview over?

12 A. A few of the things that didn't
13 neatly fall into a bucket, like an app
14 redesign or a -- a rewrite of the Android
15 app.

16 Q. Okay.

17 And who did you collaborate the
18 most, with the most on the Design Team?
19 Was there a particular person or persons
20 that you collaborated the most in that
21 role?

22 A. No.

23 Q. Okay. Just the team, period?

24 A. Yes.

25 Q. And what about the Growth Team,

1
2 was there, at that time, was there a
3 particular growth team, or was that sort
4 of embedded in every group?

5 A. It varied over the years.

6 Q. Okay.

7 A. At one point, there was a
8 separate Growth Team. There was a Growth
9 Programs Team. There was the Growth
10 Product Management Team that reported in
11 to me.

12 It varied over time.

13 Q. Okay.

14 The Growth Product Management
15 Team that reported to you, who was running
16 that team?

17 A. David Boyle.

18 Q. Okay.

19 So you were in supervisory role
20 over him at a particular time?

21 A. Yes.

22 Q. And was it during this consumer
23 product management time or a different
24 time?

25 A. Yes.

1
2 Q. And then what about the Growth
3 Team as it relates to the business product
4 lead position, I don't know if there was a
5 separate team, but were you working on
6 growth in that aspect as well?

7 A. I don't understand the question,
8 sorry.

9 Q. Sure.
10 So, going back to your first
11 role within Snap, was there a growth team
12 at that point in time?

13 A. No, I don't think so.

14 Q. Okay.
15 Was it -- there wasn't a growth
16 team formally, but there was one
17 informally, or was that just on your plate
18 as well?

19 A. It was not on my plate when I
20 first joined the company.

21 If I recall correctly, they
22 hired someone briefly to be a growth
23 product lead, and I don't think that that
24 person stayed at the company for very
25 long. I -- I don't remember the details.

1
2 Q. Okay, I understand.

3 But certainly then when the
4 company matured a little bit, and I just
5 mean that in terms of years, in this 2017
6 to 2022 period of time, there was a growth
7 team, David Boyle was, kind of, running
8 it, and he was reporting to you?

9 A. Yeah, I think that's right.
10 There was someone before Boyle -- David
11 Boyle, [REDACTED] who also reported in
12 to me, and then he reported in to David
13 Boyle. I don't remember the exact
14 timeline of -- I think David Boyle joined
15 us in 2018 or 2017, something like that.
16 But for the most of it he was managing
17 that team.

18 Q. Okay.
19 That person could have been
20 before him, is what you're saying?

21 A. Yes, [REDACTED] did join the company
22 before David Boyle did.

23 Q. Okay.
24 What's [REDACTED]'s last name?

25 A. [REDACTED]

1
2 Q. [REDACTED], okay.

3 Anything else notable about the
4 consumer product management in terms of
5 high points that we haven't hit on yet?

6 A. No.

7 Q. Okay.

8 And then you proceeded to New
9 Products and Bets in 2022 through
10 presumably until you left in -- in
11 September of 2024. Is that right?

12 A. Yes.

13 Q. Okay.

14 What's new Products and Bets?
15 In parentheses there it says Snapchat
16 Plus, My AI, Spotlight, et cetera. But,
17 sort of, what was that role?

18 A. Yes, I went from being a manager
19 of the Consumer Product Management Team
20 for those years to around 2022 moving into
21 what we would call an individual
22 contributor role where I didn't manage
23 anyone. And by doing so, I basically shed
24 my teams off to other managers and started
25 to become more of what we call an IC, an

1
2 individual contributor, the first of those
3 projects being Spotlight and launching
4 Spotlight and getting it off the ground,
5 and then after that, Snapchat Plus and
6 after that My AI. And through that I
7 became a manager again, like I -- at some
8 point, maybe 2023, so the IC year was
9 probably one year or so. Just it was
10 during the pandemic. We were all remote.
11 I got tired of being on Google Meet calls
12 all day and dealing with everyone's
13 problems and went to being an IC. And
14 then I think we were back in person, I
15 took up management responsibilities again.

16 Q. Completely understood.

17 Okay. And when you worked on --
18 on Spotlight, were you working with
19 Michael Weissinger?

20 A. Yes.

21 Q. Okay.

22 When you worked on -- was he,
23 kind of, the main person that you were
24 working with on Spotlight, or was it
25 somebody else?

1
2 A. I can't remember exactly when we
3 hired Michael, but he -- I hired Michael
4 to report to me to work on Spotlight
5 ranking.

6 Q. Okay.

7 And what's Spotlight Ranks, just
8 in a few words?

9 A. Ranking the content that you see
10 in the Spotlight feed.

11 Q. Okay.

12 So where it's positioned within
13 the Spotlight feed, is that part of
14 ranking?

15 A. Yes.

16 Q. Okay.

17 A. So I can describe how --

18 Q. Sure.

19 A. -- that works, but similar to as
20 you would see in a feed on other social
21 media platforms, like YouTube or
22 Instagram, the order in which you see that
23 content is what we call ranking. And
24 Michael's primary responsibility when we
25 first hire him was to focus on improving

1
2 that ranking to make the content more
3 relevant to what you -- you know, the user
4 wanted to see.

5 Q. Okay, understood.

6 And if the content is more
7 relevant for what the user wants to see,
8 then that user can be more engaged.

9 Is that sort of the objective of
10 that ranking process?

11 MR. BLAVIN: Objection; vague
12 and ambiguous.

13 A. Can you define "engaged"?

14 Q. Well, why don't you -- why don't
15 you define "engaged" for us as it relates
16 to your work at Snapchat. What
17 constitutes an engaged user?

18 A. I usually didn't use the word
19 "engaged" because it is somewhat
20 ambiguous.

21 I would say that in ranking,
22 there's generally an objective function,
23 what are you trying to increase, and
24 sometimes that objective function is one
25 thing, like you're trying to increase the

1
2 A. Because often people compared
3 Snapchat to other companies that did call
4 themselves social media.

5 Q. Okay. And what are those
6 companies?

7 A. Primary one would be Facebook.

8 Q. Okay.

9 And did Snapchat internally look
10 at other social media companies as
11 competitors?

12 A. Yeah, I would say that we didn't
13 look that much, but yes. I mean, it's
14 hard to ignore that that's how investors
15 looked at us and advertisers.

16 Q. And what types of things can you
17 do on Snapchat, can a user do?

18 A. Snapchat's primarily a messaging
19 service. You can -- it's primarily a
20 messaging service. You can chat and send
21 photos and videos to friends.

22 Q. Okay.

23 And what else can you do on
24 Snap?

25 A. Over the years, the company's

1
2 added a lot of other features. They added
3 chat. They added stories where you can
4 watch something that another user posted.
5 There is now Spotlight, as we discussed
6 earlier, for watching videos. There's
7 Memories where you can look back at photos
8 and videos that you've taken. There is
9 the Snap Map where you can look at a map,
10 that map includes live, relatively live
11 videos that other users have posted to the
12 Snap Map. It includes where your friends,
13 if they've shared their location with you,
14 are on the map. There's, you know, of
15 course the camera which Snapchat spends
16 considerable resources on making creative
17 tools like lenses, stickers, filters.

18 I think that covers most of it.

19 Q. Okay.

20 You could do a lot on Snapchat,
21 correct? A user can do a lot on the app?
22 If they open the app there's a lot they
23 can do, correct?

24 A. I think you could say there's a
25 lot of features.

A C K N O W L E D G M E N T

STATE OF)
:ss
COUNTY OF)

I, JOSHUA SIEGEL, hereby certify
that I have read the transcript of my
testimony taken under oath in my
deposition of March 20, 2025; that the
transcript is a true and complete record
of my testimony, and that the answers on
the record as given by me are true and
correct.

JOSHUA SIEGEL

Signed and subscribed to before me this
_____ day of _____, 20__.

Notary Public, State of

C E R T I F I C A T E

STATE OF NEW YORK

COUNTY OF NEW YORK

I, Marie Foley, RMR, CRR, a
Certified Realtime Reporter and Notary
Public within and for the State of New
York, do hereby certify:

THAT JOSHUA SIEGEL, the witness
whose deposition is hereinbefore set
forth, was duly sworn by me and that such
deposition is a true record of the
testimony given by the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 24th day of
March, 2025.

<%3843,Signature%>

MARIE FOLEY, RMR, CRR